

Buchwald, J

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

KAYE SCHOLER LLP,

Plaintiff,

v.

CNA HOLDINGS INC. and CELANESE AMERICAS
CORPORATION,

Defendants.

CNA HOLDINGS, INC. and CELANESE AMERICAS
CORPORATION,

Counterclaim-Plaintiffs,

v.

KAYE SCHOLER LLP, ROBERT B. BERNSTEIN,
and MICHAEL D. BLECHMAN,

Counterclaim-Defendants.

No. 08 CIV 5547 (NRB)

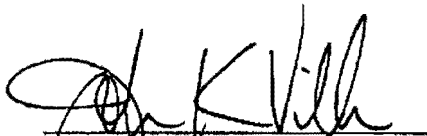
USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/28/2011

Judge Naomi R. Buchwald,
Presiding

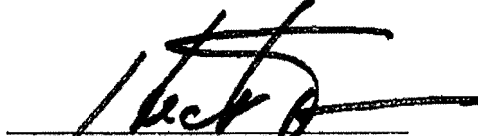
JOINT STIPULATION AND PROPOSED ORDER

Plaintiff and Counterclaim-Defendants Kaye Scholer LLP, Robert B. Bernstein, and Michael D. Blechman, and Defendants and Counterclaim-Plaintiffs CNA Holdings, Inc. and Celanese Americas Corporation, by their undersigned counsel, hereby jointly stipulate to vacate and dissolve the Protective Orders issued in this case governing the confidentiality and use of documents and information provided in discovery, including without limitation the Agreed Protective Order filed June 8, 2009 and the Amended Protective Order filed May 13, 2010. The parties jointly stipulate that these Protective Orders are null and void, of no force and effect, and the obligations, limitations, and restrictions contained in them are no longer applicable to the

parties in this case. The parties agree to return to each third-party who produced documents in this case, and who is not under the control of a party, all documents produced by that third-party that were designated "confidential" under the above Protective Orders.



John K. Villa
jvilla@wc.com
David S. Blatt
Philip A. Sechler
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005



Hector Torres
htorres@kasowitz.com
Harold Levison
KASOWITZ BENSON TORRES
& FRIEDMAN LLP
1633 Broadway
New York, NY 10019

- and -

- and -

Alan Levine
Jonathan Bach
COOLEY LLP
The Grace Building
1114 Avenue of the Americas
New York, NY 10036

Steven F. Molo
Michael G. Pattillo, Jr.
MOLOLAMKEN LLP
540 Madison Avenue
New York, NY 10022

*Attorneys for Kaye Scholer LLP,
Robert Bernstein, and Michael
Blechman*

*Attorneys for CNA Holdings, Inc. and
Celanese Americas Corp.*

Date: January 28, 2011

IT IS SO ORDERED.

Dated: January 28, 2011



The Honorable Naomi Reice Buchwald
United States District Court Judge